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Via ECF

April 18, 2025

The Honorable Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Charles v. Pinnacle Too, LLC., et al.*
Case No.: 22-cv-4232 (DEH)(JW)

Dear Judge Willis:

This office represents Plaintiff in the above-referenced matter. We write in response to the letter filed today by Individual Defendant Antony Girona on behalf of himself, and Corporate Defendants Pinnacle Too, LLC, Agir Electrical, LTD (“Pinnacle Defendants”). In that letter, Pinnacle Defendants ask that the Court extend their time to obtain new counsel from April 18, 2025 until May 19, 2025. The Court should deny their request to extend the stay any further.

Regardless of what Pinnacle Defendants’ prior lawyers knew or did not know, Pinnacle Defendants were subject to the court-ordered deadline to obtain new counsel and have new counsel file an appearance on the docket. It is clear that they already have new counsel since the letter filed today was written by an attorney. More importantly, Individual Defendant Antony Girona is the owner of Agir Electrical, LTD and to imply that he did not know that Agir Electrical, LTD was owned by Pinnacle Electric ESOP, or that his former lawyers did not know this (presumably because he did not provide this information to them during the nearly three years of this litigation) has no bearing on the Court order staying the case, which expires today. Moreover, not only did Pinnacle Defendants fail to have their new counsel file an appearance on the docket today, as ordered by the Court, but their request to extend the stay is also untimely and not in compliance with rule I(C) of the Court’s Individual Practices.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

cc: all parties via ECF